

Committed to Excellence in Broadcasting and Education

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> The Honorable Michael K. Powell Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554

> > Re: CS Docket No. 98-120

NBC Channel 3 - KVBC Las Vegas, Nevada 702-642-3333

NBC Channel 4 - KRNV Reno, Nevada 775-322-4444

NBC Channel 10 - KENV Elko, Nevada 775-777-8500

NBC Channel 7 - KWNV Winnemucca, Nevada 775-322-4444

NBC Channel 3 - KBJN Ely, Nevada 702-642-3333

NBC Channel 9 - KBMO Tonopah, Nevada 702-642-3333

NBC Channel 11 - KYMA Yuma, Arizona 928-782-1111

NBC Channel 6 - KPVI Pocatello, Idaho 208-232-6666

NBC Channel 12 - KTVH Helena, Montana 406-457-1212

NBC Channel 9 - KBBJ Havre, Montana 406-457-1212

NBC Channel 13 - KBAO Lewistown, Montana 406-457-1212

NBC Channel 13 - KCWY Casper, Wyoming 307-577-0013

NBC Channel 13 - KCHY Cheyenne, Wyoming 307-577-0013

NBC Channel 2 - KJWY Jackson, Wyoming 307-733-2066

NBC Channel 7 - KSWY Sheridan, Wyoming 307-577-0013

FOX Channel 35 - KXTF Twin Falls, Idaho 208-733-0035 Dear Chairman Powell:

I am writing to you to urge you to postpone any decisions on digital multicast carriage until a full evaluation of the impact of digital multicast carriage is completed. A quick decision on this issue has the potential to slow and even destroy the efforts to complete the digital transition in smaller communities.

When the Commission instituted the digital television conversion in 1997, one of the benefits cited was the ability of broadcasters to simultaneously broadcast multiple programming streams instead of the single analog program stream. Multicasting will help spur the progress of a hallmark issue of this Commission, the need to expand localism within the communities served by broadcasters.

Sunbelt Communications Company takes great pride in its commitment to local service. In many of the markets it operates in, Sunbelt stations provides the most local news coverage. Multicasting will allow Sunbelt to expand its local news operations by providing additional coverage to important stories, 24 hour weather information and more public affairs programming. During this past political season, Sunbelt hosted a number of political candidate debates for state and federal offices. Multicasting will provide Sunbelt the opportunity to have more debates for many more offices.

In order for multicasting to be a success, cable and satellite providers must retransmit all multicast programming streams, not a select few. Sunbelt operates in many small markets in the western United States. In many of these markets more than 90 percent of television households rely upon cable or satellite to receive local programming. If cable and satellite providers do not carry these multicast programming streams, broadcasters will have almost no audience for these services. This policy will discourage many households, especially those in small and rural communities, from investing in digital technology.

Sunbelt has and continues to spend millions of dollars for digital television services. Many of the communities served by Sunbelt have not taken to digital television like communities in larger more urban areas. Nevertheless, Sunbelt believes that the success of digital television in smaller communities is connected to the ability to provide multiple programming options for viewers. By allowing cable and satellite providers to strip alternate programming vehicles from the main

Other Sunbelt Companies



Las Vegas Locations Rainbow and 95 North West Sahara and Paseo del Prado Stephanie and Warm Springs Rampart and West Charleston



broadcast signal, we risk creating a scenario where smaller communities have fewer choices than residents in major metropolitan areas.

I urge you to delay any action on multicast carriage until an evaluation of these rules on smaller and rural communities is completed.

Sincerely,

/s/ Ralph Toddre

Ralph Toddre President and Chief Operating Officer